

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

RICHARD REID,
Plaintiff,

v.

DRIFTWOOD HOSPITALITY
MANAGEMENT II, LLC,
Defendant.

§
§
§
§
§
§
§
§

CIVIL ACTION NO. 3:20-CV-2581-B

**DEFENDANT'S FIRST SUPPLEMENT TO
NOTICE OF REMOVAL**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Defendant DRIFTWOOD HOSPITALITY MANAGEMENT II, LLC (“Driftwood Hospitality”) and files this First Supplement to its Notice of Removal (Doc. 1) and in response to the court’s Order to Show Cause (Doc. 4), and would show the court the following:

E. DIVERSITY OF CITIZENSHIP

10. The district courts of the United States have original jurisdiction over this action pursuant to 28 U.S.C. § 1332:

- (a) **Plaintiff** is a citizen of the State of Texas (Doc. 1-1, Exh. C-1, p. 1).
- (b) **Defendant Driftwood Hospitality** is a limited liability company formed in the state of Delaware and has its principal place of business in Palm Beach County, Florida. Therefore, Driftwood Hospitality, is a citizen of the state of Florida.
- (c) **Defendant Driftwood Hospitality** is comprised of the following four members:
 - (i) **Driftwood Ventures, Inc.** is incorporated in the state of Florida and has its principal place of business in the state of Florida.
 - (ii) **Carlos J. Rodriguez, Inc.** is incorporated in the state of Florida and has its principal place of business in the state of Florida.

- (iii) **Steve Johnson** is a citizen of the state of Arizona.
- (iv) **Driftwood Acquisition & Development, LP** is a limited partnership formed in the state of Delaware and has its principal place of business in the state of Delaware.
- (d) **Defendant Driftwood Hospitality** has the following three managers:
 - (i) **David Buddemeyer** is a citizen of the state of Florida.
 - (ii) **Carlos J. Rodriguez** is a citizen of the state of Florida.
 - (iii) **Charles M. Diaz** is a citizen of the state of Florida.

Accordingly, there is complete diversity of citizenship between all parties plaintiff and all parties defendant; and, as first identified in the Original Petition, the amount in controversy exceeds \$75,000.00, exclusive of interest and costs.

F. DEFENDANT'S PRAYER

WHEREFORE PREMISES CONSIDERED, Defendant Driftwood Hospitality, pursuant to these statutes and in conformance with the requirements set forth in 28 U.S.C. § 1446, removes this action for trial from the 162nd District Court of Dallas County, Texas to the U.S. District Court for the Northern District of Texas, Dallas Division.

Respectfully submitted,

/s/ Michael C. Lawrence

MICHAEL C. LAWRENCE

SBN: 00784453

Law Offices of Gallerson & Yates

8070 Park Lane, Suite 200

Dallas, TX 75231

TEL: 469-242-8953

FAX: 855-614-6695

irvinglegalmail@libertymutual.com

michael0949.lawrence@libertymutual.com

ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served in accordance with the FEDERAL RULES OF CIVIL PROCEDURE on this 8th day of September 2020 upon the following counsel of record:

T. Craig Sheils

Email: craig@sheilswinnubst.com

Lattice E. Andrews

Email: latrice@sheilswinnubst.com

Kimberly A. Quirk

Email: kimberly@sheilswinnubst.com

Sheils Winnubst, PC

1100 Atrium II

1701 N. Collins Boulevard

Richardson, Texas 75080

Attorneys for the Plaintiff

/s/ Michael C. Lawrence

MICHAEL C. LAWRENCE